

U.S. Repository Network

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Office of Science Policy
National Institutes of Health
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Bethesda, MD 20892

Submitted via [electronic form](#)

Re: Notice Number NOT-OD-23-091

The U.S. Repository Network (USRN) is grateful for the opportunity to comment on the NIH's request for information regarding the agency's plan to enhance public access to the research it funds. The USRN is an inclusive community committed to advancing repositories in the U.S. through advocacy, good practices, and community building. The organization, supported by SPARC (the Scholarly Publishing and Academic Resources Coalition), is propelled by the community-driven strategic vision that an interoperable network of repositories is an essential component of our national research infrastructure, offering rapid and open access to research, and plays a crucial role in collective efforts to transform global research communications, leading to a more open, inclusive, and equitable system.

Repositories are key institutional tools that ensure access to and reuse of valuable research outputs. They support preservation; facilitate reproducibility of research, research assessment, and compliance workflows; afford new opportunities for publishing; and increase individual and institutional visibility. By enabling rapid and open access to research outputs, repositories accelerate the pace of scholarship and the social impact of research for the public good.

Acting collectively, repository hosts can leverage their power to strengthen repositories and interact with other types of services, adding value and leading to significant innovation in the landscape.

Question 1. How can NIH best ensure equity in publication opportunities for its investigators?

The USRN is supportive of repository deposit as a primary compliance mechanism for the NIH Public Access Policy. It is critical that NIH-funded investigators understand that they can fully comply with the agency's public access policy by depositing their author's accepted manuscripts into PubMed Central (PMC) - or any other agency approved repository - and that there is no fee required to do so.

The USRN recently released its [Desirable Characteristics for Digital Publication Repositories](#), which is intended to align with the [Desirable Characteristics of Data Repositories for Federally Funded Research](#) already issued by the National Science and Technology Council. The USRN Desirable Characteristics have been developed with input from the US repository community, and provide community guidance,

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advance understanding of the utility and value of repositories, and, ultimately, increase the interoperability and coherence of U.S. repositories.

We are concerned that compliance mechanisms that rely on article processing charges (APCs) reinforce and/or introduce inequities within the research communication system. For instance, [APCs](#) have proven to be prohibitively expensive for individuals and their institutions, and [studies](#) have documented that APC costs disproportionately affect younger researchers, female researchers, and those at less well-funded institutions. APCs also require a diversion of funds away from the research process; investigators often must use money originally intended for materials and equipment, supporting postdocs, and for professional development opportunities including presenting research results at conferences. Ensuring ease of compliance through fast, free repository deposit mechanisms will provide an important channel to help eliminate the need for such expensive, unsustainable fees.

We appreciate NIH's commitment to avoiding further inequity as an unintended consequence of its policy, and are eager to support NIH in this commitment, providing a compliance route at no cost to investigators.

Question 2. What steps can NIH take to improve equity in access and accessibility of publications?

Repositories ensure that research outputs are discoverable, visible, and accessible for future use, extending beyond publications and creating an open ecosystem that will support linking, verification, and reuse of the entire corpus of research results. Moreover, repositories enhance access to research outputs through their lack of paywalls and their use of open licensing. Encouraging the use of open licenses that enable full reuse rights (such as those offered by Creative Commons) would ensure the robust utility of NIH-funded research.

NIH, with its long history of hosting PubMed Central, can share best practices for implementing robust machine-readability and text mining functionality as well as assistive technology to further improve equity in access and accessibility, with the rest of the repository community. The USRN stands ready to work with the NIH to advance equity in access and accessibility across the U.S. repository landscape.

We thank the NIH for centering equity in both its draft policy and planning process, and for providing the opportunity to submit these comments.

Sincerely,

Tina Baich
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U.S. Repository Network